Q1 In terms of setting design standards for the processing of children's personal data by providers of ISS (online services), how appropriate you consider the above age brackets would be:

- ○ Not at all appropriate
- ○ Not really appropriate
- ○ Quite appropriate
- ◉ **Very appropriate**

Q1A Please provide any views or evidence you have on how appropriate you consider the above age brackets would be of setting design standards for the processing of children's personal data by providers of ISS (online services).

[redacted]**the Child Development guide used for the Digital Childhood report (and for the UKCISS document "Child Safety Online" 2016). The age ranges are based on current child development research which demonstrated definite and nuanced differences as children grow. Previous definitions o f children as being 0-18 fail to capture the immense differences between children, even within 1-2 year age brackets. I fully understand that industry may struggle to make allowances for such fine differences, but I think it is essential that they contemplate age ranges of 4 years at most (i.e. 0-4, 5-9, 10-14, 15-19 years). This will lose some important child development information, but would at least allow for differentiation. Alternatively, there could be a two levelled system which incorporates the proposed closely defined age brackets, with a second layer which summarises the developmental needs according to Key Stages (as per educational system).**

Q2 Please provide any views or evidence about children's development needs in an online context for each, or any of the above age brackets.

The following age brackets represent, in my view, the clearest, workable distinction of children's development and

needs: 3-5, 6-9, 10-12, 13-15 and 16-17. They tie in with child development research and align with traditional notions of early childhood, middle childhood and adolescence. Current research on adolescence development is highlighting the need to differentiate stages between early, middle and late adolescence also. In particular, frontal lobe development is considered a lynchpin of adolescent development, with roles indicated for impulsivity, risk-taking as well as social connectivity.

Q3 Please provide any views or evidence you have on how the Convention might apply in the context of setting design standards for the processing of children's personal data by providers of ISS (online services).

See R16 00625_Q5f.docx

Q4 Please provide any views or evidence you have on what you think the Information Commissioner should take into account when explaining the meaning and coverage of these terms in the Code?

See R16 000625_Q5g.docx

Q5 Please provide any views or evidence you have on the following:

Q5A the opportunities and challenges you think might arise in setting design standards for the processing of children's personal data by providers of ISS (online services), in each or any of the above areas.

The challenge will be using the child development evidence we have to make design standards appropriate for a child at each age range. If less nuanced services are more workable, these also need to be evidence based and as refined as possible. Children's data collection should be strictly on a need to protect, rather than exploit, the child.

Q5B how the ICO, working with relevant stakeholders, might use the opportunities presented and positively address any challenges you have identified.

There is a difference in cultures between commercial and academic areas, with the same research being used in different ways to either expose or protect vulnerabilities inherent to childhood. Having easy access, and an opportunity to discuss, robust psychological evidence on both child development and digital use may help industry and government bridge the gap with academia.

Q5C what design standards might be appropriate (ie. where the bar should be set) in each or any of the above areas and for each or any of the proposed age brackets.

As detailed in the Digital Childhood report.

Q5D examples of ISS design you consider to be good practice.

See R16 000625_Q5k.docx

Q5E additional areas (not included in the list above) which you think should be the subject of a design standard.

All main areas are covered.

Q6 Name

[redacted]

Q6a Email

[redacted]

Q6b Brief summary of what you think you could offer

I work both academically and clinically around child, adolescent and family well-being. In my daily work I have to communicate research evidence in a way that is accessible and meaningful, and am keen to contribute to this epoch of age appropriate design development .

Q7 Please provide any other views or evidence you have that you consider to be relevant to this call for evidence.

I agree with every point made by 5Rights in their contribution to the consultation.

Q8 Are you (select one):

A body representing the views or interests of children?

A body representing the views or interests of parents?

A child development expert?

A provider of ISS likely to be accessed by children?

A trade association representing ISS providers?

An ICO employee

Clinical Child Psychologist